



Counsellors at Law

COURT PLAZA SOUTH – EAST WING
21 MAIN STREET, SUITE 101
P.O. BOX 647
HACKENSACK, NEW JERSEY 07601-0647

TELEPHONE (201) 487-3800
FACSIMILE (201) 487-8529

VIA ECF

June 7, 2018

HOBOKEN OFFICE
1422 GRAND STREET
UNIT 4A
HOBOKEN, NEW JERSEY 07030

NEW YORK OFFICE
488 MADISON AVENUE
17th FLOOR - SUITE 1700
NEW YORK, NEW YORK 10022
(212) 324-0169

FLORIDA OFFICE
2255 GLADES ROAD
SUITE 324 ATRIUM
BOCA RATON, FLORIDA 33431

www.winnebanta.com

JOSEPH L. BASRALIAN +
ROBERT M. JACOBS
GARY S. REDISH +
RICHARD R. KAHN +
KENNETH K. LEHN /
ROBERT J. KLEEBLATT
STANLEY TURITZ
ARTHUR I. GOLDBERG +
RONALD M. ABRAMSON
MARTIN J. DEVER, JR. + *
PETER J. BAKARICH, JR. +
THOMAS J. CANGIALOSI, JR. +
CAROLYN GERACI FROME
BRUCE R. ROSENBERG
RICHARD D. WOLLOCH +
MICHAEL G. STINGONE p
KHOREN BANDAZIAN +
DENNIS G. HARRAKA / x
JEFFREY L. LOVE +
IAN S. KLEEBLATT
MICHAEL J. COHEN +
JASON P. CAPIZZI + d

ROBERT A. HETHERINGTON III (RET)
MATTHEW COHEN + (RET)
WALTER G. WINNE (1889-1972)
HORACE F. BANTA (1895-1985)
BRUCE F. BANTA (1932-1983)
PETER G. BANTA (1935-2016)

CHRISTINE R. SMITH
R.N. TENDAI RICHARDS
MARLA WOLFE TAUS +
DORIS BRANDSTATTER
THOMAS R. McCONNELL
MATTHEW C. MILLS + ■

MARK E. LICHTBLAU +
JARED L. GURFEIN +
ROMAN VACCARI p +
ARIELLE GREENBAUM SAPOSH +
ALICE B. NEWMAN + ■
FRANK J. FRANZINO, JR. +
COUNSEL TO THE FIRM

/ CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A CIVIL TRIAL
ATTORNEY
+ MEMBER NEW YORK BAR ALSO
* MEMBER CONNECTICUT BAR ALSO
p MEMBER PENNSYLVANIA BAR ALSO
■ MEMBER FLORIDA BAR ALSO
d MEMBER WASHINGTON, D.C. BAR ALSO
x R. 1:40 QUALIFIED MEDIATOR

Email address: mcohen@winnebanta.com
Direct Dial: 201-562-1088

Honorable Cathy Waldor, U.S.M.J.
United States District Court
Martin Luther King, Jr. Federal Building
& Courthouse
50 Walnut Street, Room 4040
Newark, New Jersey 07102

Re: Grupo Omor, S.A. de C.V., et al. v. R.R. Importaciones, Inc., et al.
Civil Action No. 2:18-CV-400-KM-CLW

Dear Judge Waldor:

We represent defendants Gutierrez Distributors, LLC and Fernando Gutierrez in connection with the above-referenced matter. I write to request an additional 30 day extension of time to answer the Second Amended Complaint in this case. The Gutierrez defendants have already utilized their automatic 14 day extension. The time to Answer thereunder runs on June 12. If granted, the Gutierrez defendants' Answer would now be due on July 12. I have conferred with counsel for the plaintiff, Edward Kiel, who consents to the additional 30 day extension of the Gutierrez defendants' time to Answer. If this extension is acceptable to Your Honor, kindly advise accordingly by So Ordering the relevant portion of this letter. Should the Court have any questions about this request, please do not hesitate to contact me.

Respectfully submitted,

s/ Michael J. Cohen

Michael J. Cohen

MJC/ft

cc: All counsel of record (Via ECF)